

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

WEARABLE SHOE TREE LLC,

Plaintiff,

v.

THE INDIVIDUALS, BUSINESS ENTITIES, &  
UNINCORPORATED ASSOCIATION IDENTIFIED  
ON EXHIBIT 1,

Defendants.

Civil Action No. 4:24-cv-334-SDJ

**MOTION TO APPROVE CONSENT JUDGMENT AND PERMANENT INJUNCTION**

Wearable Shoe Tree LLV (“Plaintiff”) and Doe 506 “Oluk” (Walmart Merchant ID 10001133300) (“Defendant”) move for entry of a Consent Judgment and Permanent Injunction in the form attached to this motion as Exhibit A. Defendant acknowledges and agrees that Plaintiff owns valid rights in Plaintiff’s U.S. Trademark Registration No. 4686931 for the SNEAKER SHIELDS composite mark, U.S. Trademark Registration No. 6220820 for the SHIELDS standard character mark, U.S. Trademark Registration No. 7458351 for the SNEAKER SHIELDS standard character mark, and U.S. Patent No. D970,203 S titled “Wearable Shoe Tree” (the “Registrations”); and admits that, without Plaintiff’s authorization and without any remuneration to Plaintiff, Defendant reproduced, published, distributed, publicly displayed, and sold products that infringe on Plaintiff’s Registrations. The Consent Judgment and Permanent Injunction requires Defendant to pay to Plaintiff the damages amount stipulated therein.

Under the attached Consent Judgment and Permanent Injunction, the Court will retain jurisdiction of this matter for the purposes of enforcing the terms of said Consent Judgment and Permanent Injunction and awarding damages or other relief for violations thereof.

**AGREED AS TO FORM AND CONTENT:**

Dated: September 11, 2024

**SCALE LLP**

By: /s/ Charles A. Wallace

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Attorney for Defendant